

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DAVID GOLDSTINE,

Plaintiff,

v.

FEDEX FREIGHT, INC., a Washington State  
entity; "DOE(S) 1-100", employees of FEDEX  
FREIGHT, INC.; and CORPORATION(S)  
XYZ 1-100,

Defendants.

NO. 2:18-cv-01164 MJP

UNOPPOSED MOTION AND ORDER  
GRANTING EXTENSION OF TIME TO  
FILE RESPONSIVE PLEADING

**I. UNOPPOSED MOTION**

Defendant FedEx Freight, Inc. ("FedEx") hereby moves the Court for a 1-day extension of time to respond to Plaintiff's Motion to Compel. Pursuant to LCR 7(d), the current due date for FedEx's response is scheduled for May 29, 2019. FedEx requests the above-described 1-day extension due to a scheduling conflict that has hindered its ability to adequately respond to Plaintiff's Motion to Compel by the currently scheduled response date of May 29, 2019. Plaintiff's counsel has been advised and has consented to the above-requested extension of the deadline for FedEx's response to Plaintiff's Motion to Compel to May 30, 2019.

STIPULATED MOTION AND ORDER  
GRANTING EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING- 1

#1249208 v1 / 43010-011

KARR TUTTLE CAMPBELL  
701 Fifth Avenue, Suite 3300  
Seattle, Washington 98104  
Main: (206) 223 1313  
Fax: (206) 682 7100

1 It is so stipulated this 28<sup>th</sup> day of May, 2019.

2 KARR TUTTLE CAMPBELL

3  
4 s/ Medora A. Marisseau

5 Medora Marisseau, WSBA No. 23114  
6 701 Fifth Avenue, Suite 3300  
7 Seattle, WA 98104  
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/s/ Ada K. Wong

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9 /s Donald H. Snook

10 Donald H. Snook, Pro Hac Vice  
11 FedEx Freight, Inc.  
12 1715 Aaron Brenner Drive, Ste 600  
13 Memphis, TN 38120  
14 Telephone: 901-434-8305  
15 Facsimile: 901-468-1765  
16 Email: donald.snook@fedex.com  
17 Attorneys for Defendant FedEx Freight, Inc.

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STIPULATED MOTION AND ORDER  
GRANTING EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING- 2  
#1249208 v1 / 43010-011

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**ORDER**

THIS MATTER having come before the Court on the Unopposed Motion for Order Granting Extension of Time to File Responsive Pleading, and the Court having considered the Motion, hereby orders as follows:

It is ORDERED that the due date for Defendant's response to Plaintiff's Motion to Compel shall be extended to May 30, 2019.

DATED this 28 day of May, 2019.

  
The Honorable Martha J. Pechman

Presented by:

KARR TUTTLE CAMPBELL

/s/ Medora A. Marisseau

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/s Donald H. Snook

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Facsimile: 901-468-1765  
Email: donald.snook@fedex.com  
Attorneys for Defendant FedEx Freight, Inc.

**CERTIFICATE OF SERVICE**

I, Natalie M. Tapias, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 701 Fifth Ave., Suite 3300, Seattle, WA 98104. On this day, I caused the foregoing Unopposed Motion and Order Granting Extension of Time to File Responsive Pleading to be served on the parties listed below in the manner indicated.

Ada K. Wong  
Jordan T. Wada  
AKW Law, P.C.  
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ada@akw-law.com  
jordan@akw-law.com  
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*Attorney for Plaintiff*

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Via U.S. Mail  
Via Hand Delivery  
Via Electronic Mail  
Via Overnight Mail  
Via ECF/E Service

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct, to the best of my knowledge.

SIGNED this 28<sup>th</sup> day of May, 2019 at Seattle, Washington.

Natalie Tapias  
Natalie Tapias